

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE ESTATE OF MARK D. MADOFF, ANDREW
H. MADOFF, individually and as Executor of the
Estate of Mark D. Madoff, and STEPHANIE S.
MACK.

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 09-1503 (SMB)

**[PROPOSED] ORDER GRANTING TRUSTEE'S MOTION FOR
LEAVE TO FILE A THIRD AMENDED COMPLAINT**

THIS MATTER, having come before the Court on Plaintiff's Motion for Leave to File a Third Amended Complaint (the "Motion"), and the Court having considered the submissions in support of and in opposition (if any) to the Motion, and the Court having found good cause for the relief sought in the Motion, it is hereby **ORDERED** that the Motion is **GRANTED**.

Plaintiff's Third Amended Complaint, in substantially the form attached to the Motion as Exhibit 1, is to be filed on or before _____, 2014.

SO ORDERED.

Dated: _____, 2014
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE